12 November 2009

Attention:

Associate Professor Brin Grenyer Chair, Psychology Board of Australia

Dear Prof Grenyer

Re: Feedback on Consultation Paper:
Registration Standards and Related Matters

Issued by the Psychology Board of Australia, dated 27 October 2009

Many thanks for circulating the Consultation Paper for comment.

I agree with the proposals submitted within the paper and congratulate the Board on drawing together both national and international standards to form a model which is able to sit comfortably within our local milieu. Whilst I provide comment upon each section of the paper individually below, I recommend that all primary aspects of the proposal be endorsed. When taken together the proposed changes form a matrix of strategies that very effectively reflect the main intention of the Board, that is, to protect the public.

The proposed minimum standards for continuing professional development are to be commended. The standards are in part consistent with the current practice of members of the professional association for psychologists (the Australian Psychological Society) however membership to that association is voluntary. The public will be well served by a system which can ensure that professional registration is conditional upon a minimum acceptable standard of continuing professional development.

The standards of training presented in the proposal for 'Generalist Registration' ensure consistency across the states and territories of Australia and a movement toward greater consistency across registrants. The endorsement and requirement for ongoing training of supervisors is a positive step toward enhancing the quality and consistency of the supervision and training received by psychologists at all stages of development.

I also strongly support the proposal for 'Specialist Registration'. The current situation, which allows unregulated professional labels, provides highly misleading information to the public in their attempts to discern appropriate practitioners for their need. However, in contrast to the Consultation Paper, I would recommend a review

of the number of 'Specialist' titles proposed (Table 4.1) to ensure that overlap, and hence potential confusion, is minimised.

In summary, I strongly support the proposals presented in the Consultation Paper. There is a long overdue need for greater regulation of the psychology profession and processes that ensure consistent and high standards of training and professional governance. I have concerns regarding the implementation of the complex processes that will be required to manage such changes to registration requirements and of the responses of various industrial commissions and employing organisations to what may be perceived as increasing stringency in relation to one profession amongst the various health professions. These are factors that will need to be dealt with as changes occur. My concerns however, are overshadowed by the obvious advantages to our public and the minimisation of risk that will stem from the implementation of such changes to our regulatory standards.

Yours sincerely

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